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Ltd. and Mitsui & Co. (U.S.A.), Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

This Document Relates to Individual Case  
No. 3:11-cv-04119-SI

Case No. 3:11-cv-04119-SI

Master File No. 3:07-md-1827-SI

MDL No. 1827

P.C. RICHARD & SON LONG ISLAND  
CORPORATION, et al.,

Plaintiffs,

v.

AU OPTRONICS CORPORATION, et al.,

Defendants.

STIPULATION OF EXTENSION OF TIME  
FOR DEFENDANTS MITSUI & CO.  
(TAIWAN), LTD. AND MITSUI & CO.  
(U.S.A.), INC. TO RESPOND TO THE  
FIRST AMENDED COMPLAINT AND  
~~PROPOSED~~ ORDER

**Clerk's Action Required**

1 WHEREAS, plaintiffs P.C. Richard & Son Long Island Corporation, Marta Cooperative  
2 of America, Inc., and ABC Appliance, Inc. ("Plaintiffs") filed a First Amended Complaint in the  
3 above-captioned action against defendant Mitsui & Co. (Taiwan), Ltd. ("Mitsui Taiwan") and  
4 Mitsui & Co. (U.S.A.), Inc. ("Mitsui USA"), among other defendants, on June 15, 2011.

5 WHEREAS, Plaintiffs, Mitsui Taiwan and Mitsui USA, among other defendants,  
6 previously entered into a stipulation, giving Mitsui Taiwan and Mitsui USA until December 5,  
7 2011 to move to dismiss, answer or otherwise respond to the First Amended Complaint. (See  
8 Dkt. #28; MDL Dkt. #3956).

9 WHEREAS, on December 1, 2011, Mitsui Taiwan intends to move to dismiss the  
10 amended complaint in the related case of *Electrograph Systems, Inc., et al. v. Epson Imaging*  
11 *Devices Corp., et al.*, Individual Docket No. 3:10-cv-00117-SI (N.D. Cal.), Master Docket No.  
12 3:07-md-01827-SI (N.D. Cal.) on the grounds that the Court lacks personal jurisdiction over  
13 Mitsui Taiwan.

14 WHEREAS, Mitsui Taiwan also intends to raise lack of personal jurisdiction as a defense  
15 in the instant case.

16 WHEREAS, the Court's ruling on Mitsui Taiwan's motion to dismiss in *Electrograph*  
17 may be relevant to the issue of personal jurisdiction in the instant case.

18 WHEREAS, Plaintiffs, Mitsui Taiwan and Mitsui USA have reached an agreement,  
19 pursuant to Civil Rule L.R. 6-1(a), that Mitsui Taiwan and Mitsui USA shall have an additional  
20 extension of time until twenty-one (21) days after the Court rules on Mitsui Taiwan's motion to  
21 dismiss in *Electrograph*, in which to move against, answer, or otherwise respond to Plaintiffs'  
22 First Amended Complaint.

23 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the  
24 undersigned counsel, on behalf of their respective clients, Plaintiffs, on the one hand, and Mitsui  
25 Taiwan and Mitsui USA, on the other hand, that Mitsui Taiwan and Mitsui USA's deadline to  
26 move to dismiss, answer, or otherwise respond to the First Amended Complaint will be twenty-  
27 one (21) days after the Court issues its order on Mitsui Taiwan's motion to dismiss the amended  
28 complaint in *Electrograph*.

1 Dated: November 29, 2011

2 By: /s/ Michael E. Mumford  
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16 *and Mitsui & Co. (U.S.A), Inc.*

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23 *Long Island Corporation, Marta Cooperative*  
*of America, Inc., and ABC Appliance, Inc.*

1 Attestation: The filer of this document attests that the concurrence of the other signatories  
2 thereto has been obtained.

3 **[PROPOSED] ORDER**

4 IT IS SO ORDERED.

5 DATED this 30<sup>th</sup> day of Nov, 2011.

6  
7 By:   
8 Hon. SUSAN ILLSTON